



SECURITIES AND

Washington, D.C. 2007.

ANNUAL AUDITED REPORT **FORM X-17A-5** PART III

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FACING PAGE

Information Required of Brokers and Dealers Pursuant to Section 17 of the Securities Exchange Act of 1934 and Rule 17a-5 Thereunder

REPORT FOR THE PERIOD BEGINNING	2/1/03	AND ENDING_	1/31/04
	MM/DD/YY		MM/DD/YY
A. RE	GISTRANT IDENTIFI	CATION	
NAME OF BROKER-DEALER:	T GODDODAMION		OFFICIAL USE ONLY
SLATER FINANCIA ADDRESS OF PRINCIPAL PLACE OF BU		Box No.)	FIRM I.D. NO.
5745 SW 75th ST	REET PMB 293	SECTION PROPERTY OF THE PROPER	
GAINESVILLE FL	32608 (No. and Street)	MAR 3 1 2004	
(City)	(State)		(Žip Code)
NAME AND TELEPHONE NUMBER OF P HOWARD SLATER	erson to contact in PRES	RECARD TO THIS R	EPORT 352-371-6800
			(Area Code – Telephone Numbe
B. ACC	COUNTANT IDENTIF	ICATION	
INDEPENDENT PUBLIC ACCOUNTANT	whose opinion is contained	in this Report*	
	HORKEY & ASSOCI	ATES DA	
	(Name – if individual state last 8211 W. BROWAF	first, middle name) RD BLVD	
(Address)	FIFTH FLOOR - PLANTATION, FL 33	(State)	(Zip Code)
CHECK ONE:			
Certified Public Accountant			PROCESSED
☐ Public Accountant			
☐ Accountant not resident in Un	ited States or any of its poss	essions.	APR 2 0 2004
	FOR OFFICIAL USE	NLY	FINANCIAL
<u> </u>	<u> </u>		

*Claims for exemption from the requirement that the annual report be covered by the opinion of an independent public accountant must be supported by a statement of facts and circumstances relied on as the basis for the exemption. See Section 240.17a-5(e)(2)

Potential persons who are to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.

OATH OR AFFIRMATION

I,	HOW	<i>I</i> ARD	SLATER		, swear (or affirm) that, to the best of
my			d belief the accompan FINANCIAL C		ent and supporting schedules pertaining to the firm of , as
of	JAN	IUAR	y 31, 2004	, 20	, are true and correct. I further swear (or affirm) that
nei					fficer or director has any proprietary interest in any account
cla	ssified so	olely as	s that of a customer, e	xcept as follows:	
					Al God
	ſ				Had Stol
	SET A	AUBL.	JANET G. WATERS Notary Public. State of Florida		Signature
			comm. expires June 15, 20		PRESIDENT
			No. CC945603		Title
)_		12	ا ا امام	Title
\subseteq	Aum	<u>_</u>	guarde	-3 26 04	
	(/	Not	ary Public		
Thi	is report	** con	tains (check all applic	able boxes):	
	(a) Fac	ing Pa	ge.		
	N 2		of Financial Condition	on.	
四			of Income (Loss). of Changes in Finance	ial Condition	
\boxtimes					rtners' or Sole Proprietors' Capital.
X			of Changes in Liabili		
X			ion of Net Capital.		
					nents Pursuant to Rule 15c3-3.
					equirements Under Rule 15c3-3. of the Computation of Net Capital Under Rule 15c3-3 and the
ίΧι					irements Under Exhibit A of Rule 15c3-3.
					Statements of Financial Condition with respect to methods of
	con	solida	tion.		•
X			or Affirmation.		
님			the SIPC Supplemen		and the second decline and the second decline and the data of the second decline and the
ш	(n) Are	port a	escribing any material	inadequacies round to	exist or found to have existed since the date of the previous audit.

^{**}For conditions of confidential treatment of certain portions of this filing, see section 240.17a-5(e)(3).

REPORT ON AUDIT OF FINANCIAL STATEMENTS

FOR THE YEARS ENDED JANUARY 31, 2004 AND 2003

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- * Certified in Florida Sales Tax
- ** Certified Family Mediator

INDEPENDENT ACCOUNTANTS' REPORT

March 24, 2004

Board of Directors and Stockholders Slater Financial Corporation Gainesville, Florida

We have audited the accompanying statements of financial position of Slater Financial Corporation (the Company) as of January 31, 2004 and 2003 and the related statements of operations and retained earnings and cash flows for the years then ended that you are filing pursuant to Rule 17a-5 under the Securities Exchange Act of 1934. These financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on these financial statements based on our audit.

We conducted our audit in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinion.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of Slater Financial Corporation as of January 31, 2004 and 2003, and the results of its operations and cash flows for the years then ended in conformity with accounting principles generally accepted in the United States of America.



Page 2 March 24, 2004 Board of Directors and Stockholders Slater Financial Corporation

Our audit was made for the purpose of forming an opinion on the basic financial statements taken as a whole. The information contained in the schedules presented on pages 10, 11, and 15 is presented for purposes of additional analysis and is not a required part of the basic financial statements, but is supplementary information required by Rule 17a-5 under the Securities Exchange Act of 1934. Such information has been subjected to the auditing procedures applied in the audit of the basic financial statements and, in our opinion, is fairly stated in all material respects in relation to the basic financial statements taken as a whole.

Horkey + Austrates, P.A.
Certified Public Accountants
Fort Lauderdale, Florida

STATEMENTS OF FINANCIAL POSITION

JANUARY 31, 2004 AND 2003

		2004		2003
ASSETS				·
Current Assets Cash and Cash Equivalents Accounts Receivable - Trade Prepaid Expenses Total Current Assets	\$	28,756 5,075 3,300 37,131	\$ -	32,519 1,163 3,300 36,982
	\$	37,131	\$ =	36,982
LIABILITIES AND STOCKHOLD	ERS' I	EQUITY	٠	
Current Liabilities Accounts Payable Income Taxes Payable Total Current Liabilities	\$ —	7,839 397 8,236	\$ -	5,800 165 5,965
Stockholders' Equity Common Stock -100 shares voting stock authorized .75 shares issued and outstanding Additional Paid in Capital Retained Earnings (Deficit)		1 25,021 3,873 28,895	<u>-</u>	1 25,021 5,995 31,017
	\$ _	37,131	\$ =	36,982

STATEMENTS OF OPERATIONS AND RETAINED EARNINGS

YEARS ENDED JANUARY 31, 2004 AND 2003

	2004	2003
Revenue Commissions Interest Income	\$ 286,248 194 286,442	\$ 201,546 382 201,928
Operating Expenses Commissions - Officers Commissions - Salesmen Other Operating Expenses	40,000 76,811 171,356 288,167	0 79,783 116,621 196,404
Income Before Income Taxes	(1,725)	5,524
(Provision) Benefit for Income Taxes	(397)	(1,715)
Net Income (Loss)	(2,122)	3,809
Retained Earnings- Beginning of Period	5,995	2,186
Retained Earnings- End of Period	\$ <u>3,873</u>	\$5,995

The accompanying notes are an integral part of these financial statements

STATEMENTS OF CASH FLOWS

YEARS ENDED JANUARY 31, 2004 AND 2003

	2004	2003
Cash Flows From Operating Activities		
Net Income (Loss)	\$ (2,123)	\$ 3,809
Adjustments to reconcile net income (loss) to cash provide (used) by operating activities Decrease (increase) in accounts receivable Decrease (increase) in prepaid expenses Increase (decrease) in accounts payable Increase (decrease) in income tax payable	net (3,912) - 2,040 232	2,057 1,550 (3,199) 165
Net Cash Provided (Used) By Operating Activities	(3,763)	4,382
Cash Flows From Investing Activities	-	
Purchase of stock treated as investment		_
Net Cash Provided (Used) By Investing Activities		
Net Increase (Decrease) in Cash	(3,763)	4,382
Cash - Beginning of Period	32,519	28,137
Cash - End of Period	<u>\$ 28,756</u>	\$ 32,519
Supplemental Disclosures of Cash Flow Informat Cash Paid During the Year For: Interest Income Taxes	ion: \$ - \$ 142	\$ - \$ -

The accompanying notes are an integral part of these financial statements

NOTES TO FINANCIAL STATEMENTS

YEARS ENDED JANUARY 31, 2004 AND 2003

A. Summary of Significant Accounting Policies

Business and Organization - Slater Financial Corporation (the Company), a Florida Corporation, is a broker-dealer and a member of the National Association of Securities Dealers (NASD).

In addition, the Company is an approved dealer for various mutual fund houses and is an agent for various insurance companies. Any transactions made with mutual fund houses or insurance companies are consummated directly between the customer and the mutual fund house or insurance company; the Company receives a commission as agent. Prior to November 1998 the Company sold listed securities and otherwise managed customer accounts on a fully disclosed basis, as a registered securities broker-dealer using the services of a clearing broker-dealer. The Company now sells only mutual funds and variable annuities as a broker-dealer.

Change in the Reporting Entity - Slater Financial Corporation was formed in July, 1993 and commenced operations September, 1993. The Company was created, for tax purposes, as a "spin-off" of substantially all the assets of a predecessor corporation, Howard Slater and Company (HSC) on September 1, 1993. HSC, an NASD registered securities broker-dealer was owned by the same stockholders as the Company. The Company is the successor to the NASD registration and brokerage and variable annuity of operations of HSC. HSC retained only the fixed annuity operations in the "spin-off", and is no longer required to register with the NASD as a securities broker-dealer. The Company was formed to segregate the variable annuity and brokerage operations into a separate company from the fixed annuity operations. This segregation was done to keep the operations required to be registered with the Securities and Exchange Commission and the NASD (brokerage and variable annuity operations) separate from the operations, which do not require those registrations (fixed annuity operations).

Accounting Estimates - The preparation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect certain reported amounts and disclosures. Accordingly, actual results could differ from those estimates.

NOTES TO FINANCIAL STATEMENTS

YEARS ENDED JANUARY 31, 2004 AND 2003

A. Summary of Significant Accounting Policies (continued)

Revenues and Expenses - The Company recognizes commission revenue and related expenses for insurance annuities and mutual fund transactions are recognized when the customer consummates the transaction.

Income Taxes - The Company has no material timing differences
between book and taxable income.

Reclassifications - Certain reclassifications have been made to the 2003 financial statements to conform to those used in the 2004 financial statements.

Cash and Cash Equivalents - For financial reporting and statement of cash flow purposes, cash and cash equivalents includes all demand deposit accounts, savings accounts money market accounts and certificates of deposits with maturities of less than 90 days from January 31, 2004.

B. Related Party Transactions

During the years ended January 31, 2004 and 2003, the Company paid certain expenses to and on behalf of several related companies and to Howard and Anne Slater individually in lieu of rent and occupancy costs. These costs might not be equivalent to those the Company would incur to lease equivalent space for its operations. The Company also paid automobile expenses and commissions to these related companies and to Howard and Anne Slater individually. A summary of the amounts paid by the Company to or on behalf of these related parties for the years ended January 31, 2004 and 2003 is as follows:

	2004	2003
Automobile Occupancy	10,581 71,659	6,198 36,342
Commissions		
Amounts unpaid at year end		

The amounts for automobile and occupancy are included in "Other Operating Expenses" in the financial statements.

NOTES TO FINANCIAL STATEMENTS

YEARS ENDED JANUARY 31, 2004 AND 2003

C. Net Capital Requirements

The Company is subject to the Securities and Exchange Commission Uniform Net Capital Rule (Rule 15c 3-1), which requires the maintenance of minimum net capital and requires that the ratio of aggregate indebtedness to net capital, both as defined, shall not exceed 15 to 1. At January 31, 2004, the Company had net capital of:

Net Capital	Ratio	• 4	10 to	1
Net Capital		\$	25,0	95
Minimum Net Required	Capital		5,0	00
Excess Net (Capital	\$	20,5	95

NOTES TO FINANCIAL STATEMENTS

YEARS ENDED JANUARY 31, 2004 AND 2003

D. Stockholders' Equity

The Company is authorized to issue 100 shares of voting common stock and 100 shares of non-voting common stock, par value \$1 per share, of which 39 shares have been issued. The common stock was divided into the two voting classes and ownership interests as follows at January 31, 1997:

- 1. .75 shares are voting securities and may be held only by a person duly licensed as an operations, financial, municipal and options principal with the National Association of Securities Dealers, Inc., and who has been approved in writing by all the holders of non-voting common stock and;
- 2. 38.25 shares are non-voting securities, but in all other respects identical to the voting common stock.

The non-voting common stock noted above was revoked and retired during the fiscal year ended January 31, 1998 when the Company determined that the owner of these shares was no longer in business and therefore ineligible to hold these shares. At that time, the balance was treated as a contribution to additional paid in capital.

A summary of common stock at January 31, 2004 and 2003 is shown in the schedule below.

	_20	004	2003
Voting Common Stock, \$1 par value, 100 shares authorized, .75 shares issued and outstanding	\$	1	\$ 1
Non-voting Common Stock, \$1 par value, 100 shares authorized, no shares issued and outstanding	\$ -		·
	\$	1	<u>\$ 1</u>

SUPPLEMENTARY INFORMATION

COMPUTATION OF NET CAPITAL, BASIC NET CAPITAL REQUIREMENT AND AGGREGATE INDEBTEDNESS

JANUARY 31, 2004

COMPUTATION	OF	MET	CAPTTAL.
COLLOIVITON	OΓ	TALL	CULTIUM

Total Stockholders' Equity	\$28,895
Non-allowable Deductions and/or Charges	3,800
Net Capital	<u>\$25,095</u>
COMPUTATION OF BASIC NET CAPITAL REQUIPMENT (greater of a or b)	REMENT
a. Minimum Net Capital Required (6 2/3 % of Aggregate Indebtedness)	<u>\$ 549</u>
b. Minimum Dollar Amount of Net Capital Required	<u>\$ 5,000</u>
Excess Net Capital	<u>\$20,095</u>
COMPUTATION OF AGGREGATE INDEBTEDNE	<u>SS</u>
Total Aggregate Indebtedness	<u>\$ 8,236</u>

Ratio of Aggregate Indebtedness to Net Capital

0.40

RECONCILIATION OF THE COMPUTATION OF NET CAPITAL AND EXEMPTIVE PROVISION UNDER RULE 15c3-3

JANUARY 31, 2004

RECONCILIATION OF THE COMPUTATION OF NET CAPITAL

Because of various audit adjustments, differences will sometimes arise between the computation of Net Capital and Aggregate Indebtedness, as presented and reported herein and as reported by the Company in Part IIA of Form X-17A-5, as of January 31, 2004.

Net Capital reported on Part IIA of Form X-17A-5	\$25,491
Rounding	1
Net Audit Adjustments	(397)
Net Capital after Audit Adjustments	\$25,095
Aggregate Indebtedness reported on	
Part IIA of Form X-17A-5	\$ 7,839
Net Audit Adjustments	397
Aggregate Indebtedness after Audit Adjustments	<u>\$ 8,236</u>

EXEMPTIVE PROVISION UNDER RULE 15c3-3

With respect to the Computation for Determination of Reserve Requirements under Rule 15c3-3, the Company qualifies for exemption under subparagraph (k)(1) of the Rule.



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INDEPENDENT ACCOUNTANTS' REPORT ON INTERNAL ACCOUNTING CONTROL REQUIRED BY SEC RULE 17a-5

March 24, 2004

Board of Directors and Stockholders Slater Financial Corporation Gainesville, Florida

In planning and performing our audit of the financial statements and supplemental schedules of Slater Financial Corporation (the Company), for the year ended January 31, 2004, we considered its internal control in order to determine our auditing procedures for the purpose of expressing our opinion on the financial statements and not to provide assurance on internal control.

Also, as required by Rule 17a-5(q)(1) of the Securities and Exchange Commission (the SEC), we have made a study of the practices and procedures followed by the Company including tests of such practices and procedures that we considered relevant to the objectives stated in rule 17a-5(q) in making the periodic computations of aggregate indebtedness (or aggregate debits) and net capital under Rule 17a-3(a)(11) and for determining the compliance with the exemptive provisions of Rule 15c3-3. not review the practices and procedures followed by the Company in examinations, securities quarterly verifications and comparisons, and the recordation of differences required by Rule 17a-13 or in complying with the requirements for prompt payment for securities under Section 8 of Regulation T of the Board of Governors of the Federal Reserve System, because the Company does not carry security accounts for customers or perform custodial functions relating to customer securities.



Page 2 March 24, 2004 Board of Directors and Stockholders Slater Financial Corporation

The management of the Company is responsible for establishing and maintaining internal structure and the practices and procedures referred to in the preceding paragraph. In fulfilling this responsibility, estimates and judgments by management are required to assess the expected benefits and related costs of controls and of the practices and procedures referred to in the preceding paragraph and to assess whether those practices and procedures can be expected to achieve the SEC's above-mentioned objectives. of the objectives of internal control and the practices and procedures are to provide management with reasonable, but not absolute, assurance that assets for which the Company has responsibility are safeguarded against loss from unauthorized use or disposition and that transactions are executed in accordance with management's authorization and recorded properly to permit preparation of financial statements in conformity with generally accepted accounting principles. Rule 17a-5(g) lists additional objectives of the practices and procedures listed in the preceding paragraph.

Because of inherent limitations in internal control or the practices and procedures referred to above, error or fraud may occur and not be detected. Also, projection of any evaluation of them to future periods is subject to the risk that they may become inadequate because of changes in conditions or that the effectiveness of their design and operation may deteriorate.

Our consideration of internal control would not necessarily disclose all matters in internal control that might be material weaknesses under standards established by the American Institute of Certified Public Accountants. A material weakness is a condition in which the design or operation of the specific internal control components does not reduce to a relatively low level the risk that errors or fraud in amounts that would be material in relation to the financial statements being audited may occur and not be detected within a timely period by employees in the normal course of performing their assigned functions. However, we noted no matters involving internal control that we consider material weaknesses as defined above.

Page 3 March 24, 2004 Board of Directors and Stockholders Slater Financial Corporation

We understand that practices and procedures that accomplish the objectives referred to in the second paragraph of this report are considered by the SEC to be adequate for its purposes in accordance with the Securities Exchange Act of 1934 and related regulations, and that practices and procedures that do not accomplish such objectives in all material respects indicate a material inadequacy for such purposes. Based on this understanding and on our study, we believe that the Company's practices and procedures were adequate at January 31, 2004, to meet the SEC's objectives.

This report is intended solely for the information and use of management, the SEC, the National Association of Securities Dealers and other regulatory agencies which rely on Rule 17a-5(g) under the Securities Exchange Act of 1934 in their regulation of registered brokers and dealers, and is not intended to be and should not be used by anyone other that these specified parties.

ky & auriciates, P. A. Certified Public Accountants

Fort Lauderdale, Florida

STATEMENT OF CHANGES IN LIABILITIES SUBORDINATED TO GENERAL CREDITORS

JANUARY 31, 2004

Liabilities Subordinated

\$ <u>---</u>

No liabilities were subordinated to general creditors in 2004.